

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 19-30093-RAL

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

ROLAND ROBERT HAWK, SR.,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

Beginning on a date unknown, but no later than on or about March 2014 through on or about February 2019, in the District of South Dakota, the Defendant, ROLAND ROBERT HAWK, SR., did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to his own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Crow Creek Sioux Tribe ("CCST"), an Indian Tribal Organization, and did aid and abet others in committing the offense, all in violation of 18 U.S.C. §§ 2 and 1163. Among others, Defendant ROLAND ROBERT HAWK, SR. aided and was aided by Brandon Sazue, Jacqueline Ernestine Pease, Francine Maria Middletent, Tina Grey Owl, and Roxanne Sazue.

At all times relevant to this case, ROLAND HAWK was an elected member of the CCST Tribal Council. HAWK was the Treasurer of the CCST. In this

position, HAWK was responsible for the finance office of the CCST. The CCST maintained a Wells Fargo Bank checking account for the General Welfare Program. HAWK had signature authority on this account for the entire timeframe covered by this investigation. Brandon Sazue, Roxanne Sazue, and Tina Grey Owl also had signature authority over this account at different points of time covered by this investigation. Brandon Sazue endorsed more than one check drawn from the General Welfare bank account that was embezzled, misused, or converted to his own use or to the use of one of his co-defendants, including HAWK.

Defendant's offense conduct involved his receipt of more than \$250,000 but not more than \$550,000. The money received derived from the CCST's General Welfare Account. Defendant's receipt of that money was unlawful; likewise, HAWK's co-defendants' receipt of that money was unlawful.

RONALD A. PARSONS, JR.
United States Attorney

1/21/2020
Date

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1-15-2020
Date

Roland Robert Hawk, Sr.
ROLAND ROBERT HAWK, SR.
Defendant

1-15-2020
Date

Jeromy J. Pankratz
JEROMY J. PANKRATZ
Attorney for Defendant